

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MELISSA KAYE,

Plaintiff,

-against-

NEW YORK HEALTH AND HOSPITALS
CORPORATION, ELIZABETH FORD, PATRICIA
YANG, ABHISHEK JAIN, and JONATHAN WANGEL
(said names being fictitious, the persons intended being
those who aided and abetted the unlawful conduct of the
named Defendants),

Defendants.

**NOTICE OF DEFENDANTS’
MOTION TO DISMISS THE
AMENDED COMPLAINT**

18 Civ. 12137 (JPC)(JLC)

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Donna

A. Canfield in support of Defendants’ Motion for Summary Judgment, dated March 4, 2022 and the exhibits annexed thereto, Defendants’ Statement of Undisputed Facts Pursuant to Local Rule 56.1, dated March 4, 2022, the Memorandum of Law in Support of Defendants’ Motion for Summary Judgment dated March 4, 2022; and upon all other pleadings and proceedings herein, Defendants New York City Health and Hospitals Corporation, Elizabeth Ford, Patricia Yang, Abhishek Jain, and Jonathan Wangel (hereinafter “the Defendants”) will move this Court, at the United States District Court for the Southern District Court of New York, located at 500 Pearl Street, New York, New York 10007, before the Honorable John P. Cronan, on a date and time to be determined by the Court for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment in favor of Defendants, dismissing the Amended Complaint in its entirety on the grounds that there is no genuine issue of material fact, entering

judgment for Defendants, and granting Defendants costs, fees, and disbursements together with such other and further relief as the Court deems just and proper.

Dated: New York, New York
March 4, 2022

SYLVIA HINDS-RADIX
Corporation Counsel of the
City of New York
Attorney for Defendants
100 Church Street, Room 2-124
New York, New York 10007
T: (212) 356-2461
E: dcanfiel@law.nyc.gov

By: **ECF** /s/ _____
Donna A. Canfield
Assistant Corporation Counsel

By ECF: Special Hagan, Esq.

Index No. 15 Civ. 2868 (JMF)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ADELLE GOODWINE,

Plaintiff,

-against-

THE CITY OF NEW YORK; NEW YORK CITY
DEPARTMENT OF INFORMATION TECHNOLOGY
& TELECOMMUNICATIONS, PAUL COSGRAVE,
RONALD BERGMANN, CORDELL SCHACHTER,
VINCENT GRIPPO, and CAROLE POST, in their
official and individual capabilities,

Defendants.

**NOTICE OF DEFENDANTS' MOTION
TO DISMISS THE COMPLAINT**

ZACHARY W. CARTER
Corporation Counsel of the City of New York

Attorney for Defendants
100 Church Street
New York, N.Y. 10007

Of Counsel: Donna A. Canfield

Tel: (212) 356-2461

Matter No. 2015-023487

